

OFFICE OF THE DIRECTOR  
DEPARTMENT OF MOTOR VEHICLES

Audits Office

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June 30, 2009

Laura Roth, Director  
Department of Child Support Services  
El Dorado County Office  
3057 Briw Road  
Placerville, CA 95667

Audit File: C-40-9099

Dear Ms. Roth:

The Department of Motor Vehicles' (DMV) Audits Office has concluded the audit of the Department of Child Support Services El Dorado County Office (DCSS El Dorado). We based our review on the requirements stipulated in the Memorandum of Understanding (MOU) DMV via Health and Human Services Agency Data Center (HHSDC), applicable statutes and regulations stated in the California Vehicle Code and the California Code of Regulations. We conducted an on-site audit at the Briw Road location on May 6, 2009.

This audit covered the period March 1, 2008 through March 30, 2009. The audit was performed in accordance with the Standards set forth in the General Accounting Office's *Generally Accepted Government Auditing Standards*. The objectives of the audit were to determine if DCSS El Dorado:

- Internal controls are adequate to safeguard information obtained from DMV;
- Complies with the provisions of the MOU HHSDC dated February 21, 2003;
- Adheres to applicable rules and regulations governing the processing, storage, and transmission of DMV information.

We noted one area for improvement as detailed in the *Finding and Recommendation* section of the attached report, summarized as follows:

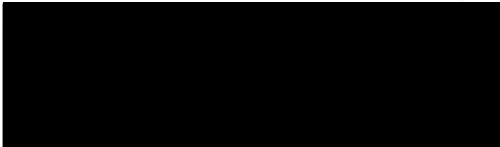
- Employees with access to DMV information contained in DCSS El Dorado hard copy files did not complete Security Statements

Please note that the report includes excerpts of the DCSS El Dorado response to our findings, as well as our evaluation. We have included your response in its entirety as Exhibit 1 at the end of the report.

DMV Information Services Branch (ISB), who has jurisdiction over government requester accounts, and the California State Department of Child Support Services will receive copies of the attached report.

We thank DCSS El Dorado and their staff for the cooperation and courtesy extended to our auditor during this review. If you have any questions about this audit, please contact Grace Rule-Ali at (916) 657-5828.

Sincerely,



**GRACE M. RULE-ALI, Manager**  
Information Systems-Requester Audit Section  
(916) 657- 5828

Attachment

cc: Joan Obert, Director, State DCSS  
Jeanne Benuzzi, DMV Acting Chief, ISB  
Tam Le, DMV Manager, ISB Policy & Information Privacy Section

DEPARTMENT OF CHILD SUPPORT SERVICES  
EL DORADO COUNTY - PLACERVILLE  
AUDIT REPORT  
C-40-9098

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## EXECUTIVE SUMMARY

The California Department of Motor Vehicles (DMV) Information Services Branch (ISB) operates an information requester program that allows external entities to access DMV records pursuant to applicable statutes of the California Vehicle Code (CVC) and California Code of Regulations Title 13, Article 5 except as prohibited by CVC Section 1808.21. As an authorized DMV Government Requester Account holder the Department of Child Support Services El Dorado County Office (DCSS El Dorado), has access to basic record and address information on California Driver License and Vehicle Registration. In accordance with its DMV Government Requester Account agreement, DCSS is allowed to make California DMV inquiries for its business needs.

The CVC mandates that DMV protect the privacy rights of the public by releasing only certain information authorized by statutes. Statutes and regulations allow for businesses and individuals to access DMV records containing both confidential and non-confidential information, contingent upon approval of an application and compliance with the program requirements. DMV is dedicated in its mission of securing personal information for consumer protection. To meet our obligation of protecting the public and DMV information, we reviewed DCSS' compliance with the DMV Government Requester Account stipulations, and applicable California laws and regulations.

Our evaluation found that DCSS El Dorado is a member of the Computer Assisted Support Enforcement Systems (CASES) Consortium. The CASES Consortium consists of 54 DCSS county member agencies authorized since July 2002 for on-line access to DMV records. While the California DCSS oversees the county member agencies in this process, CASES Consortium will be disbanded effective June 30, 2009. This will require county agencies, who wish to do so, obtain a new method for on-line access, or rely on the existing overnight batch processing to receive DMV information.

Our evaluation found that the current security controls in effect at DCSS El Dorado as of May 6, 2009, are sufficient to meet the security objectives of this audit. However, we noted one area for improvement as detailed in the *Finding and Recommendation* section of the attached report; however, it can be summarized as follows, employees with access to DMV information contained in DCSS hard copy files did not complete Security Statements.

## BACKGROUND

DMV is responsible for administering statewide programs that use and rely on information assets whether they are electronically stored or hard copy documents. DMV conducts audits and evaluations of entities accessing the information of the Department, for compliance purposes.

In June 2002 statutory changes reshaped the California child support program. The local county child support agencies (LCSA) were no longer considered law enforcement agencies and had to change the access methods to obtain data from DMV.

Formerly, LCSA requested access to DMV's databases via CLETS. Effective July 1, 2002, due to the June statutory changes, DMV granted approval to allow CASES Consortium electronic access to data from its files via the existing Health and Human Services Data Center. The Consortium consisted of 54 LCSA. DMV's approval was granted with the condition that the appropriate access, logging and auditing controls are in place. The requester codes have the following access to DMV information:

- Driver license – to locate individuals in the effort to establish and enforce child support obligations.
- Vehicle registration – to locate individuals in the effort to establish and enforce child support obligations.

DCSS county agencies use their requester codes to access California Driver License, and Vehicle information to locate absent parents in order to secure child support for the child. The DCSS El Dorado has on-line access as a member of the CASES Consortium.

## **OBJECTIVES, SCOPE, AND METHODOLOGY**

The objectives of the review were to determine if DCSS El Dorado:

- Internal controls are adequate to safeguard information obtained from DMV
- Complies with the provisions of the MOU
- Adheres to applicable rules and regulations governing the processing, storage, and transmission of DMV information

The audit was performed in accordance with *Government Auditing Standards*, Generally Accepted Auditing Standards, the California Department of Motor Vehicles' Government Requester Account Requirements and applicable California laws and regulations.

Our evaluation methodology included such tests as considered necessary to meet our objectives. Interviews were conducted with DCSS management, physical observation of the DCSS El Dorado facility made to determine the levels of security, and confidentiality over DMV information.

We conducted the audit fieldwork at the DCSS El Dorado in Placerville, California in May 2009. Our audit included an examination of the administrative security procedures, and the monitoring of programs that are in place to protect DMV information.

## FINDING AND RECOMMENDATION

### FINDING – EMPLOYEE SECURITY STATEMENT, INF 1128, REQUIREMENTS NOT FOLLOWED

**Condition:** DCSS El Dorado management did not require all employees, with direct or incidental access to DMV records, sign an Employee Security Statement, INF 1128 ( Security Statement). In addition, our review of available records found that DCSS El Dorado did not maintain evidence of Security Statement annual recertification.

During our field visit, we confirmed that all employees had access to DMV records contained in DCSS case files but only employees with on-line access to DMV information completed Security Statements. In addition, authorized employees were not required to re-certify on an annual basis.

**Criteria:** The Memorandum of Understanding - DMV via HHSDC #7 states, in part, “DCSS agrees to establish security procedures to protect DMV records and access information, as required by California Vehicle Code Section 1808.47. DCSS shall ensure that each DCSS and Requester employee having direct or incidental access to DMV records has signed an individual security statement. That statement shall contain at a minimum, the same provisions contained within the DMV’s Employee Security Statement, Form INF 1128...The forms shall be maintained on file and made available to DMV upon request.”

In addition, the Government Requester Account Application, under General Security Requirements C.3 (a) section states in part, “Requester shall require every employee and the system administrator having direct or incidental access to Department records to sign a copy of the Information Security Statement (INF 1128). The INF 1128 is required upon initial authorization for access to Department records and annually thereafter. The Requester’s signed statement(s) shall be maintained on file at Requester’s worksite for at least two years following the deactivation or termination of the authorization and shall be available to Department upon demand.”

**Recommendation:** DCCS El Dorado should establish procedures requiring all employees with any access to DMV information sign an Information Security Statement, INF 1128. In addition, we suggest scheduling a specific date each year for employees to recertify the INF 1128, and maintain them on file for the two-year required retention period.

**DCSS El Dorado Response:** “DCSS El Dorado will ... completed DMV access ... agreements for all staff...”

**Department Response:** We concur with DCSS El Dorado’s corrective action plan.

## CONCLUSION

DCSS El Dorado operates a system and program that permits its employees access to DMV information, and provides assurance that access to the information is appropriately controlled and monitored in accordance with the requirements of its Government Requester Account. We noted that Employee Security Statement requirements were not followed. However, taken as a whole the mechanisms and controls in place to protect information received from DMV are sufficient and functioning properly to fulfill the program objectives. Therefore, implementing the report's recommendations should result in improvement of information security awareness for DCSS employees who have access to DMV information. Because of inherent limitations in control systems, errors or irregularities may occur and not be detected. Consequently, projection of any evaluation of systems to future periods is subject to risk since procedures may become inadequate because of changes, or the degree of compliance with procedures may deteriorate.



**GRACE M. RULE-ALI, MANAGER**

Information Systems-Requester Audit Section  
Audits Office  
(916) 657-5828

May 15, 2009

**Review Team:**

Carolyn Manuel, Auditor In-Charge, Auditor  
Benedicta Ikhalo, Auditor  
Andrew Lau, Auditor

## EXHIBIT 1





**COUNTY OF EL DORADO  
DEPARTMENT OF  
CHILD SUPPORT SERVICES**

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June 17, 2009

Andrew Lau  
State of California  
Department of Motor Vehicles  
Audits Office  
2570 24<sup>th</sup> Street, m/s H121  
Sacramento, Ca. 95818

Re: El Dorado County's Compliance Audit and Corrective Action

Dear Mr. Lau,

Please accept this letter as confirmation that the El Dorado County Child Support Services has, in response to the informal findings at our audit on May 6, 2009, completed DMV access and records retention usage agreements for all staff including janitors and IT staff that have access to our records.

We understand that those agreements are to be completed yearly and retained for your offices viewing.

If there are any remaining concerns or questions, please feel free to contact me directly.

I look forward to reviewing your preliminary audit findings.

Respectfully,

Laura D. Roth  
Director